

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

THOMAS DEXTER JAKES,

Plaintiff,

v.

DUANE YOUNGBLOOD, et al.,

Defendants.

No. 2:24-CV-1608-WSS

**NOTICE OF BLACKBURN'S CONTINUED SUBMISSION OF AI HALLUCINATIONS
IN OTHER CASES**

Counsel for Plaintiff Thomas Dexter Jakes writes to notify the Court of recent developments bearing on its pending Order to Show Cause. Last week, in an unrelated case in the Southern District of New York,¹ Tyrone Blackburn was again accused of submitting a motion to dismiss supported by AI hallucinations. The accusations center on a Memorandum that Blackburn filed on August 11, 2025—after, for example, this Court's Order to Show Cause Hearing (ECF No. 60) and after Blackburn purportedly took 11 CLEs about AI-related issues (ECF No. 63-4).

The filing that flagged the alleged hallucinations (**Ex. A** at 1, 10-13) and the Memorandum containing them (**Ex. B**) are both attached for the Court's reference.

¹ *Cartagena v. Dixon*, No. 1:25-cv-03552-JLR (S.D.N.Y.). Mr. Blackburn is also the subject of a pending Sanctions Motion in a companion case. *See* Roc Nation's Sanctions Mot., *Dixon v. Cartagena*, No. 1:25-cv-05144 (S.D.N.Y.), ECF Nos. 14-15. But those accusations concern bad-faith filings and baseless allegations, not AI hallucinations.

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Respectfully Submitted,

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